

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF NEW YORK**

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9384-2557 Québec Inc., a Canadian corporation; MINEDMAP, INC., a Nevada corporation; and SERENITY ALPHA, LLC, a Nevada limited liability, and other similarly situated individuals : 1:19-CV-00501-TJM-CFH

MOTION TO CONTINUE JUNE 8, 2020 HEARING

Plaintiff, :

against : (ECF Case)

NORTHWAY MINING, LLC, a New York limited liability company; MICHAEL MARANDA, an individual; MICHAEL CARTER, an individual; CSX4236 MOTORCYCLE SALVAGE, LLC, a New York limited liability company; DROR SVORAI, an individual; MINING POWER GROUP, INC., a Florida corporation; HUDSON DATA CENTER, INC, a New York Corporation, MICHAEL MARANDA, LLC, a New York Limited liability company; PORTER KING HILL CONTRACTING, LLC, a New York limited liability company; COINMINT, LLC, a Delaware limited liability company; OSWEGO DATA LLC, a New York Limited Liability Company; LORI S. THOMPSON, LCSW, PLLC, a professional limited liability corporation; LORI S. THOMPSON, an individual, ANTHONY PORTER, an individual; and DONALD D'AVANZO, an individual

Defendants. :
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Plaintiffs, MinedMap et. al., through counsel, T. Edward Williams, Esq., files this Motion to Continue the June 8, 2020 Hearing, and, in support thereof, state as follows:

1. Defendants scheduled a hearing on their Motion to Dismiss for June 8, 2020.

From a reading of the docket, Defendants appeared to have scheduled an in-person hearing notwithstanding the current public health crisis and the scheduling and other difficulties it brought with it. The undersigned has not been in his office since late February or early March. The undersigned is prepared to attend the hearing on the scheduled date via some electronic means, be it video or telephone conference.¹

2. However, if the hearing is set to proceed as an in-person hearing, the undersigned seeks to attend in-person rather than through telephone or video conference, especially where Defendants have the opportunity to appear in person. The undersigned's clients prefer that the undersigned attended the hearing in person. As good cause for continuing the hearing, the undersigned states that the current shelter-in-place orders have been extended through June 13, 2020. The shelter-in-place orders and the current public health crisis constitute good cause as indicated by the many General Orders issued by this Court. Assuming the Court is available, the undersigned is available to attend the hearing on **June 15, 2020** or on the next motion date less than 30 days from June 8, 2020.

Dated this 4th day of June 2020.
New York, New York

¹ Because of timing issues, the undersigned did not have the opportunity to discuss this Motion with Defendants, although the undersigned filed a Notice indicating he would seek the relief requested in this motion. This Motion can be added to the impending pre-motion conference that is likely to occur on June 5, 2020.

RESPECTFULLY SUBMITTED,

/s/ T. Edward Williams, Esq.

T. Edward Williams, Esq. Bar No. 5634738

WILLIAMS LLP

7 World Trade Center

250 Greenwich 46th FL.

New York, New York 10007

Tel: 212.634.9106

Fax: 212.202.6228

Edward.williams@wmsintl.com

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June 2020, this **MOTION TO CONTINUE JUNE 8, 2020 HEARING** was served on the following individuals:

John Harwick, Esq. *via ECF*
Counsel for Maranda Defendants